

Dear FCC,

The Telecommunications Right-of-Way Coalition (TelROW) appreciates this opportunity to provide comments in response to the Federal Communications Commission Inquiry for its Third Report on Advanced Telecommunications Capability.

About TelROW

The Telecommunications Right-of-Way Coalition ("TelROW") is a non-profit organization which coordinates interested industry participation legislative and regulatory proceedings to protect and promote the economic and social benefits of telecommunications and other infrastructure. TelROW's members have been focused on federal land management policies, specifically the policies governing fees required for rights-of-way, easements, or other authorizations to build fiber optic telecommunications facilities across federal lands and reservations. The challenges TelROW is currently addressing through its advocacy and education efforts seem particularly relevant to question #3 in the August 9 request issued by the Commission. "If deployment is not reasonable and timely, what actions will accelerate deployment? The inquiry then seeks comment on the actions the Commission could undertake if it determines that advanced telecommunications capability is not being deployed to all Americans in a reasonable and timely fashion." TelROW recommends that the Commission play a greater role in coordinating agency policies regarding federal land management policies which may hinder, delay, obstruct, or unnecessarily increase the cost of building or providing communications infrastructure or services. TelROW believes that including this problem, federal right-of-way fees, among others identified as obstacles to the accelerated deployment of communications services, will highlight this challenge for policymakers, and facilitate its prompt resolution. TelROW appreciates the opportunity to provide comment in response to the Commission's inquiry (CC Docket No. 98-146). Should you have any additional questions regarding the issues presented in these comments, please contact Eric D. Myers, Executive Director, TelROW [202-508-5508 EMyers@eei.org]

Attachment (1) -

List of TelROW Members:

BellSouth
Edison Electric Institute
Enron Broadband Services
Global Crossing
Qwest
Williams Communications
AT&T
FPL Fibernet
Sierra Pacific Resources
Public Service Company of New Mexico
Touch America
Verizon